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*Attorneys for Plaintiff/Counterclaim-  
Defendant Bank of Hope and  
Third-Party Defendant Lisa Pai*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

-----X  
BANK OF HOPE, as successor to Wilshire Bank, ECF CASE  
  
Plaintiff, 2:14-CV-01770-JLL-JAD

v.

**NOTICE OF MOTION**

MIYE CHON, a/k/a Karen Chon, SUK JOON  
RYU, a/k/a James S. Ryu, TAE JONG KIM,  
BERGENFIELD BAGEL & CAFÉ INC., d/b/a  
Café Clair, MAYWOOD BAGEL INC., UB'S  
PIZZA & BAGEL INC., UB'S BAGEL & CAFÉ  
INC., and UBK BAGELS CORP., d/b/a Franklin  
Bagels & Café,

Motion Day: April 15, 2019

Defendants.

-----X  
SUK JOON RYU, a/k/a James S. Ryu,

Counterclaim-Plaintiff,

v.

BANK OF HOPE, as successor to Wilshire Bank,

Counterclaim-Defendant.

-----X  
SUK JOON RYU, a/k/a James S. Ryu,

Third-Party Plaintiff,

v.

LISA PAI,

Third-Party Defendant.

-----X  
SUK JOON RYU, a/k/a James S. Ryu,

Cross-claim Plaintiff,

v.

MIYE CHON, a/k/a Karen Chon, TAE JONG KIM,  
BERGENFIELD BAGEL & CAFÉ INC., d/b/a  
Café Clair, MAYWOOD BAGEL INC., UB'S  
PIZZA & BAGEL INC., UB'S BAGEL & CAFÉ  
INC., and UBK BAGELS CORP., d/b/a Franklin  
Bagels & Café,

Cross-claim Defendants.

-----X

PLEASE TAKE NOTICE that, upon the annexed declaration of Lisa K. Pai, Esq., dated March 21, 2019, declaration of Michael M. Yi, Esq., dated March 22, 2019, the exhibits thereto, the accompanying memorandum of law, dated March 22, 2019, and all other prior pleadings and proceedings herein, plaintiff/counterclaim-defendant Bank of Hope ("Bank of Hope") will move this Court before the Honorable Joseph A. Dickson, at the U.S. Courthouse located at 50 Walnut Street, Courtroom 2D, Newark, New Jersey, on April 15, 2019, at 9:30 AM or as soon thereafter as counsel may be heard, for an Order:

1. Pursuant to Fed. R. Civ. P. 41(a)(2), permitting Bank of Hope to voluntarily dismiss, *with prejudice*, all of its claims for relief against defendant Suk Joon Ryu ("Ryu"), set forth in the *Amended Complaint*, dated July 11, 2016; and
2. Granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
March 22, 2019

LEE ANAV CHUNG WHITE  
KIM RUGER & RICHTER LLP

By: 

Michael M. Yi

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*Defendant*

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